

Clifford S. Davidson, OSB No. 125378  
csdavidson@swlaw.com  
Drew L. Eyman, OSB No. 163762  
deyman@swlaw.com  
SNELL & WILMER L.L.P.  
601 SW 2nd Avenue, Suite 2000  
Portland, Oregon 97204  
Telephone: 503.624.6800  
Facsimile: 503.624.6888  
Attorneys for Plaintiff Tyler Miller

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

TYLER MILLER, an individual,  
  
Plaintiff,

vs.

HENRY HEIMULLER, in his official capacity  
as Board Member of the Columbia 9-1-1  
Communications District; BRUCE HOLSEY,  
in his official capacity as Board Member of the  
Columbia 9-1-1 Communications District;  
JEFF FLATT, in his official capacity as Board  
Member of the Columbia 9-1-1  
Communications District; and SHELLEY  
HENNESSY, in her official capacity as Board  
Member of the Columbia 9-1-1  
Communications District,

Defendants.

Case No. 3:23-cv-00293-SI

DECLARATION OF CLIFFORD S.  
DAVIDSON IN SUPPORT OF PLAINTIFF'S  
MOTION TO ENFORCE SUBPOENA

I, Clifford S. Davidson, declare as follows:

1. I am over the age of 18 and am counsel of record for plaintiff Tyler Miller. I make this declaration on personal knowledge. If called upon to do so, I would testify truthfully as follows.

2. Attached hereto as Exhibit 1 is a true and correct copy of the subpoena that I caused to be served on non-party Chandra Egan.

3. Attached hereto as Exhibit 2 are true and correct copies of emails between Ron Downs, who is counsel for Egan, and me.

I declare under penalty of perjury that the foregoing is true and correct, and that I executed this declaration on September 13, 2023, at Portland, Oregon.

/s/ Clifford S. Davidson  
Clifford S. Davidson

CERTIFICATE OF SERVICE

I hereby certify that on September 13, 2023, I caused to be served a full and exact copy of the foregoing **DECLARATION OF CLIFFORD S. DAVIDSON IN SUPPORT OF MOTION TO ENFORCE SUBPOENA** on the following:

**VIA CM/ECF:**

Karen O’Kasey  
Hart Wagner LLP  
10000 SW Broadway, 20<sup>th</sup> Floor  
Portland, OR 97205  
kok@hartwagner.com  
Attorneys for Defendants

**VIA EMAIL AND FIRST CLASS MAIL:**

Ron Downs  
Special Districts Association  
727 Center Street NE, Suite 208  
Salem, OR 97301  
rdowns@sdao.com  
Attorneys for Non-Party Chandra Egan

Dated: September 13, 2023

s/ Clifford S. Davidson

Clifford S. Davidson, OSB No. 125378

4882-6216-6911